



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

| | | |
|------------------------------|---|---------------------------|
| IAN LUCAS, |) | |
| |) | |
| Plaintiff, |) | No. 3:24-cv-01359 |
| |) | |
| v. |) | Judge Richardson |
| |) | |
| VANDERBILT UNIVERSITY, and |) | Magistrate Judge Frensley |
| VANDERBILT UNIVERSITY SCHOOL |) | |
| OF NURSING. |) | |
| |) | |
| Defendants. |) | |

DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME

Pursuant to Fed. R. Civ. P. 6(b)(1), Defendants Vanderbilt University and Vanderbilt University School Of Nursing (together “Vanderbilt”) move the Court for a one month extension to file an Answer or otherwise respond to Plaintiff’s Complaint. In support of this Motion, Vanderbilt states as follows:

1. Plaintiff filed his Complaint under seal in the Davidson County Circuit Court on October 6, 2024.
2. Vanderbilt was served with a copy of the Complaint on October 17, 2024.
3. On November 15, 2024, Vanderbilt filed a Notice of Removal pursuant to 28 U.S.C. §§ 1331, 1441, and 1446.
4. Pursuant to Fed. R. Civ. P. 81(c) Vanderbilt’s deadline to Answer or otherwise respond to Plaintiff’s Complaint on Friday, November 21, 2024.
5. Counsel for Vanderbilt is in the process of completing their due diligence in investigating the allegations in the Complaint.

6. Vanderbilt's counsel contacted Plaintiff about the requested extension and was advised that Plaintiff does not oppose Defendant's request.

Accordingly, Vanderbilt respectfully requests that its responsive pleading deadline be extended to December 23, 2024.

Respectfully submitted,



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Attorneys for Vanderbilt

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing MOTION FOR EXTENSION OF TIME has been sent via e-mail to the following individuals on November 21, 2024:

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Plaintiff Pro Se



Matthew "JP" Horton II